

# EXHIBIT B

*United States v. Yanping Wang*, Case No.: S1 23-CR-118 (AT)

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

YANPING WANG a/k/a YVETTE WANG,

Plaintiff,

v.

XIANMIN XIONG a/k/a XI NUO a/k/a SINO,

Defendant.

Index No.: \_\_\_\_\_

Date Purchased: \_\_\_\_\_

Plaintiff designates New York  
County as the place of trial.

The Basis of the venue is Plaintiff's  
place of residence (New York  
County) pursuant to CPLR 503(a)

**SUMMONS**

**TO THE ABOVE-NAMED DEFENDANT:**

**YOU ARE HEREBY SUMMONED** to answer the Verified Complaint in this action and to serve a copy of your answer on the Plaintiff's attorneys indicated below, within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: New York, New York  
August 8, 2019

TO: Xianmin Xiong  
136-84 Roosevelt Avenue, Apt. A83  
Flushing, New York 11354

**CATAFAGO FINI LLP**

/s/ Tom M. Fini

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

YANPING WANG a/k/a YVETTE WANG,

Plaintiff,

v.

XIANMIN XIONG a/k/a XI NUO a/k/a SINO,

Defendant.

Index No.: \_\_\_\_\_

**VERIFIED COMPLAINT**

Plaintiff Yanping Wang a/k/a Yvette Wang (hereinafter “Plaintiff”), for her complaint against defendant Xianmin Xiong a/k/a Xi Nuo a/k/a Sino (hereinafter “Defendant”), by undersigned her counsel, states the following:

**INTRODUCTION**

1. This action is brought to redress Defendant’s ongoing campaign of threats, defamation and harassment directed to the Plaintiff, which has now culminated in Defendant approaching the Plaintiff and threatening to kill her. Indeed, after Defendant’s recent death threat to the Plaintiff, he continues to stalk Plaintiff directly outside her place of work.

2. Plaintiff accordingly seeks, among other things, compensatory and punitive damages, and an order enjoining Defendant from continuing his malicious and relentless campaign of defamation, harassment, and intimidation, and from further tarnishing Plaintiff’s reputation.

**PARTIES AND JURISDICTION**

3. Plaintiff is a female individual, who was at all times relevant hereto an adult resident of New York County, in the State of New York.

4. Defendant is a male individual, who, upon information and belief, was at all times relevant hereto an adult resident of the State of New York.

5. Jurisdiction is proper as both parties are residents of New York State.

6. Venue is proper as Plaintiff resides in New York County (CPLR 503(a)), and Defendant committed many of the tortious acts detailed herein in New York County.

## **BACKGROUND**

### **Defendant's Ongoing Defamation and Harassment of the Plaintiff**

#### **Background of the Harassment Campaign**

7. Defendant's campaign to terrorize Plaintiff began with his repeated and malicious posting of false and defamatory material on online social media platforms regarding the Plaintiff. As detailed below, these defamatory posts include the blatantly false allegations that: Plaintiff, who is a married woman, is involved in an extra-marital sexual relationship with another man; that Plaintiff has supposedly been raped by a work colleague; that Plaintiff has destroyed evidence relevant to a legal proceeding; and that Plaintiff has engaged in wrongful interrogation and detention of an alleged witness in a legal proceeding. Defendant made all of these false allegations knowing they were false, and with the malicious intent to destroy Plaintiff's reputation and career, and instill terror in her on a daily basis.

8. These defamatory statements are particularly egregious because Plaintiff is not a public figure, and is instead an innocent woman – a wife and mother – who is a private individual working for a private company.

9. Defendant's campaign against Plaintiff is persistent and continuing. For example, on August 26, 2017, Defendant posted on his Twitter account to his approximately 31,500 followers that Plaintiff, referred to as "Sister Yanping," had an intimate relationship with a man named "Robert." Specifically, Defendant tweeted the following defamatory statement: "Robert has an intimate relationship with Sister Yanping. He doesn't have a decent stance but only cares

about the money.” A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit A.

10. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely, that Plaintiff – a married woman – is having an extramarital intimate relationship with a man named Robert.

11. Subsequently, on September 5, 2017, Defendant posted another outrageous and defamatory comment regarding Plaintiff, this time purporting to quote a fake interview that Defendant falsely claims that Plaintiff gave about her relationship with her male work colleague, Guo Wengui. Specifically, Defendant tweeted that:

Wang Yanping denied today that the recording of her having sex with Guo Wengui published on Twitter was true. She even totally denied the recorded conversation between her and Ma Rui was true. She did not comment at all on the alleged rape Guo Wengui involved.

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit B.

12. The above statements by Defendant again convey false and defamatory statements of fact to the public regarding Plaintiff. Specifically, Defendant falsely alleges that Plaintiff had sex with a man other than her husband, and that Plaintiff is complicit in the rape of another woman.

13. The next day, on September 6, 2017, Defendant again posted a defamatory tweet about Plaintiff. In this post, Defendant presented a fake dialogue between Plaintiff (referred to as “Yan”) and another woman (referred to as “Ma”). This phony dialogue conveys to the public that the Plaintiff helped intimidate Ma Rui and participated in the intimidation of a witness to a crime. Specifically, Defendant tweeted the following:

Yan: I love sister Ma very much, she is a very innocent kid.

Ma: You helped bad people to victimize the weak and detained me in the apartment.

Yan: She is introverted and may suffer depression.

Ma: You grabbed my cellphone and forced me not to call the police.

Yan: All the so-called conversation recordings between Wang Yanping and Ma Rui on the internet are fake.

Ma: You may think that you can deceive some people, and you can deceive them for some period of time, but you will never be able to deceive everyone forever.

A full and correct copy of the tweet and a certified translation of its text is attached hereto as Exhibit A.

14. The above tweet makes a false and defamatory statement of fact to the public regarding Plaintiff. Specifically, it accuses Plaintiff of illegally detaining and threatening another woman, and conveys to the public that Plaintiff is lying about her involvement in these illegal actions.

15. Less than a month later, on October 12, 2017, Defendant again posted another defamatory tweet regarding the Plaintiff. Specifically, Defendant tweeted:

Wang Yanping: You have to think clearly. The case of Ma Rui is going to be a criminal case. You definitely will become one of the defendants, because you are suspected of assisting Guo Wengui in destroying the forensic evidence. You should first sue Guo Wengui for sexual assault at this critical moment, after all it is the truth. You have been terribly deceived by Guo Wengui-- you cannot go back home and you have been separated from your child and husband out of your choice. Once you are sued in court, it will be very hard to turn things around. Be smart and sue Guo Wengui immediately to turn the table around and take the situation under your control.

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit A.

16. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, that is, that Plaintiff has assisted in destroying evidence relevant to a crime, that Plaintiff was sexually assaulted, and that Plaintiff allows herself to be sexually assaulted.

17. The above defamatory statements – which are false and have no basis in fact – were made by Defendant with malice and knowledge of their falsity could only be said with the intent

to cause the direct and proximate harm of ruining Plaintiff's reputation, her business relationships, and her relationship with her husband.

**The Defamatory Statements for Which Plaintiff Asserts Defamation Claims**

18. Defendant's campaign to terrorize the Plaintiff has not only continued, but has but has increased in its ferocity and plain intent to completely destroy Plaintiff's family life and career. As part of this campaign to destroy the Plaintiff's life, the Defendant embarked on the below series of internet postings, all aimed to destroy the Plaintiff's reputation and isolate her from her family.

19. On January 18, 2019, Defendant posted a tweet falsely accusing Plaintiff of plagiarizing the signature of her work colleague Guo. Specifically, Defendant's tweet stated that:

It has been learned that the counsel Daniel Watt who is retained by Guo Wengui for a lawsuit against Xia Yeliang and Li Hongkuan has already applied for withdrawal. What is surprising is that in **Guo Wengui's confirmation letter that Daniel submitted to the court is actually signed in Yanping's handwriting.** [emphasis added]

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit C.

20. The above defamatory tweet by the Defendant conveys a false and defamatory statement of fact to the public regarding Plaintiff. Specifically, the tweet falsely conveys that Plaintiff has illegally fabricated evidence relevant to a legal proceeding.

21. On April 26, 2019, a YouTube video was uploaded in which the Defendant discussed Ms. Wang's testimony in a trial. Specifically, the Defendant states that:

So I will tell you guys about the situation of the trial this morning. There were three witnesses being examined in the morning and the first one who testified was Wang Yanping....The counsel then asked her if she knew about the purchase of this building by XXX, the off-shore company. She replied she didn't know. Yet, the counsel held a pile of papers and said, "You signed all these papers, but you knew nothing about these?" **She then stammered and said she was super nervous, she had already forgotten these matters and please pardon her. So, it was obvious that she had lied on these matters.** [emphasis added]

A true and correct copy of the relevant excerpts of the transcript of the YouTube video and a certified translation are attached hereto as Exhibit B.

22. Defendant's description of Plaintiff's testimony as quoted above is false and clearly conveys a defamatory statement of purported fact to the public regarding Plaintiff, specifically, that Plaintiff has illegally provided false testimony under oath.

23. Two days later, on April 28, 2019, Defendant posted yet another defamatory tweet about the Plaintiff. In this new tweet, Defendant falsely alleges that Plaintiff has knowledge of a sexual assault which she is not reporting. Specifically, Defendant tweeted that:

**If Wang Yanping wants to save her own ass, the only way is to file a report in the police station, accusing someone for sexual assault.** The evidence is very easy and simple, there are a lot of audio clips online. If she still cares about losing her face in public at this point, she is too stupid. [emphasis added]

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit C.

24. Two weeks later, on May 12, 2019, Defendant again falsely tweeted about Plaintiff's alleged failure to report a sexual assault, specifically tweeting:

I told Wang Yanping that you have no future if you follow Guo Wengui. Guo never has any loyalty to his friends. He uses people when they have value to him and he throws them away like a piece of cleaning shred if they have lost their value to him. **I hope that she can report to the NYPD accusing Guo Wengui raping and assaulting her.** This action will turn her situation from losing to winning [emphasis added]

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit C.

25. On that same day, May 12, 2019, Defendant also tweeted that:

**There was an occasion where Guo Wengui assaulted Wang Yanping after he got drunk. Not only did he rape Wang, he also stepped on her belly violently.** There was a recording of this audio clip online. It seems that Wa Li was there at that time too. [emphasis added]

A full and correct copy of the tweet and translation is attached hereto as Exhibit C.



26. The above-quoted three tweets clearly convey false and defamatory statements of fact to the public regarding the Plaintiff. Specifically, the tweets falsely convey that Plaintiff is a rape victim, and that Plaintiff is having sex with another man, despite being married. The tweets also falsely convey that Plaintiff is obstructing justice by not reporting crimes of which she is supposedly aware.

27. On June 7, 2019, Defendant posted yet another tweet, in which he falsely accused Plaintiff of “interrogating” Ma Rui. Specifically, Defendant tweeted that:

**Since the exposure of the audio clip about Guo Wengui and his secretary Wang Yanping interrogating Ma Rui together, Ms. Wang accepted the interview from Der Spiegel, leaving recorded proof of her voice. After verification from the Australian judicial authorities, the audio clip of Wang Yanping having an interview with Der Spiegel is the same as the audio clip of her interrogating Ma Rui.** This evidence has already been submitted to the court. [emphasis added]

A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

28. The above tweet clearly conveys a false and defamatory statement of fact to the public regarding Plaintiff, that is, that Plaintiff has been involved in the improper interrogation of a witness to a legal proceeding.

29. On July 11, 2019, Defendant posted another tweet falsely stating that Plaintiff (referred to as “Wangyanping”) and Guo Wengui interrogated Ma Rui and coerced her into destroying evidence. Specifically, Defendant alleges the following:

I have listened to the recording of Guo Wengui and Wangyanping’s interrogation on Ma Rui 5 times. **There are 9 occasions where Ma Rui was coerced to hand over the evidences of being raped,** for example, the underwear contaminated by bodily fluid, the blood-stained bed sheet, the name of the pharmacy for getting birth-control pills, the number of times of being raped, the locations of the offenses and whether or not the boat staff and security guards were present etc. [emphasis added]

A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

30. The above tweet clearly makes false and defamatory statements of fact to the public regarding Plaintiff, that is, that Plaintiff improperly interrogated and illegally coerced a witness to a legal proceeding into destroying evidence.

31. On July 13, 2019, Defendant again posted a defamatory tweet about the Plaintiff, falsely asserting that there is an alleged tape recording of Plaintiff and Guo Wengui interrogating Ma Rui. Specifically, Defendant tweeted that: “There are 3 main pieces of evidence that support the charge against Guo Wengui as a rapist: 3. **The one-hour-forty-minute audio clip of Guo Wengui and Wang Yanping interrogating Ma Rui**[.]” [emphasis added] A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

32. The above defamatory tweet conveys false and defamatory statements of fact to the public regarding Plaintiff, specifically that Plaintiff participated in a nearly two-hour improper interrogation of Ma Rui, a witness to a legal proceeding.

33. On July 13, 2019, Defendant posted a tweet containing a link to a YouTube video. Defendant describes the video as: “**Pangu Boss Guo Wengui having sex with female secretary Wang Yanping in office**[.]” [emphasis added]. A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

34. The above defamatory tweet conveys a false and defamatory statement of fact to the public regarding Plaintiff, specifically that Plaintiff, a married woman, has had sex at the office with a male colleague.

35. Later that day, Defendant posted another defamatory tweet referencing the same video. Specifically, Defendant tweeted, in relevant part:

**New evidences that support Guo Wengui as a suspect of rape are:**

\*\*\*

4. **The audio clip of Guo Wengui raping and assaulting Wang Yanping**

[emphasis added]

A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

36. The above defamatory tweets convey a false statement of fact to the public regarding Plaintiff, specifically that Plaintiff has been raped and assaulted, and that Plaintiff, a married woman, has had sex with another man.

**Defendant's Harassment Campaign Culminates with Defendant Making an In-Person Death Threat Against Plaintiff**

37. Defendant's campaign to terrorize the Plaintiff, and completely destroy her family life and business reputation, has now shockingly progressed to the point where Defendant has made an in-person death threat against the Plaintiff.

38. Specifically, on April 26, 2019, Defendant approached the Plaintiff outside of courtroom 232 in the New York County Supreme Court, located at 60 Centre Street, and ominously sat next to her, despite her request that he leave her alone. The Defendant's approaching the Plaintiff after terrorizing her for many months in defamatory postings obviously placed her in fear of bodily harm, and she repeatedly asked Defendant to leave her alone, which he refused.

39. Ignoring the Plaintiff's pleas to be left alone, the Defendant then did the unthinkable: he issued her a death threat, while jutting and raising his fists and arms threateningly toward her face and body. Specifically, Defendant stated to the Plaintiff, while raising his fists toward her:

**"You will be killed in a car accident."**

**"You will never see your child or your husband again."**

**"You are throwing your life away."**

40. The Defendant's death threats issued to Plaintiff as he sat next to her placed Plaintiff in fear of her life. Plaintiff again pleaded for the Defendant to leave her alone. Yet, faced

with the Plaintiff terrorized and in tears, Defendant persisted in his course of terror against Plaintiff, an innocent woman. The Defendant hurled his head and arms toward the Plaintiff and continued with his verbal abuse and assault.

41. To further make clear to Plaintiff that her life was in danger, the Defendant referenced the untimely death of a Chinese dissident residing in France of similar approximate age as Plaintiff. Plaintiff lived in France for a number of years.

42. Defendant made his death threat to the Plaintiff intentionally, with malice, and with the actual intent to cause the Plaintiff to fear serious bodily harm or death. Defendant's statements were objectively meant to invoke fear in Plaintiff and convey that the Plaintiff and her family would suffer serious bodily injury and death.

**Defendant Escalates His Death Threat by Appearing at Plaintiff's Doorstep, And Engaging in Violence to Terrorize Her**

43. The Defendant's terrorizing behavior did not stop with the death threat issued in the courthouse. Following the April 26, 2019 threat on her life, the Defendant has now escalated the death threat by coming directly to her doorstep and engaging in acts of violence, all making clear that Defendant is prepared to carry out the threat on her life. As discussed below, Defendant has repeatedly come to Plaintiff's place of work, despite the fact that he does not live or work on that block, and has acted violently even when security was called.

44. There is no reasonable basis for Defendant to be near Plaintiff's place of work as Defendant does not work or live on the block where Plaintiff's office is located. The only reason for this behavior is to instill imminent fear of bodily harm in Plaintiff.

45. First, on July 25, 2019, having recently made the in-person death threat against the Plaintiff, Defendant suddenly appeared directly outside the building where Plaintiff works (162 E.

64<sup>th</sup> Street, New York County, New York). Defendant menacingly lurked outside the building for at least thirty minutes.

46. The following day, on Friday, July 26, 2019, the Defendant *again* menacingly appeared outside of Plaintiff's place of work (162 E. 64<sup>th</sup> Street), and remained there for at least thirty minutes. Subsequently, on Saturday, July 27, 2019, Defendant again appeared outside Plaintiff's place of work (162 E. 64<sup>th</sup> Street), and remained ominously outside the front door of the building for at least thirty minutes.

47. Thereafter, on Monday July 29, 2019, Defendant again menacing appeared directly outside the building where Plaintiff works. Because the Defendant had appeared outside of Plaintiff's work so many times, this time Plaintiff had a member of a security team go out to ask Defendant what his purpose was. Shockingly, rather than leaving, the Defendant confronted a member of the security team, lunging his body and arms toward the security team member in a violent manner.

48. Defendant's defiance and acts of violence toward a security officer has only heightened the very real fear of serious bodily injury and death that the Plaintiff has as a result of the Defendant's ongoing acts of harassment, intimidation, violence and death threats.

49. Indeed, despite his interaction with the security guard the previous day, the Defendant again menacingly appeared the very next day (July 30, 2019) directly outside of the building where Plaintiff works and attempted to **gain access to the building**. This was clearly in an attempt to harm and harass Plaintiff and further showing that the Defendant has malicious intent and that he is completely undeterred by any security team.

50. Plaintiff, fearing for her safety and well-being, filed a police report with the NYPD, and it is Plaintiff's understanding that an investigation into the Defendant's criminal conduct ensued and is ongoing.

**Defendant's Campaign of Ongoing Harassment Has Also Caused Serious Emotional and Economic Damages, and Destruction of Her Marriage**

51. Defendant's malicious defamation campaign has caused Plaintiff serious damage to her reputation. Defendant's malicious defamation campaign has also caused the destruction of Plaintiff's marriage and prevented her from seeing her young son, as it has included, among other things, the false allegation of an ongoing extra-marital sexual relationship. As a result of the destruction of her reputation and marriage, Plaintiff has suffered extreme emotional distress.

52. Defendant's malicious defamation campaign has also caused Plaintiff substantial damages to her business contracts and relationships. Plaintiff is a consultant in the financial industry, specializing in providing advice as to the local customs, regulations, and policies that exist in mainland China. Her reputation as an honest and trustworthy business woman is essential to her trade. Thus, Defendant's defamatory statements that Plaintiff is engaged in extramarital affairs, the destruction of evidence, and the interrogation and intimidation of witnesses to criminal conduct clearly injure her in her line of business.

53. For example, because of Plaintiff's deep experience with and knowledge of Chinese business practices, Plaintiff had a lucrative consulting contract with ACA Investment Management Limited ("ACA"), under which Plaintiff advised a Hong Kong business on local customs, regulations, and policies that exist in mainland China.

54. Under the contract with ACA, Plaintiff was to receive \$1.5 million a year.

55. Defendant was aware of Plaintiff's contract with ACA, and her prospective business relationship with ACA. Defendant maliciously intended to destroy Plaintiff's business relationships, including with ACA, by publicly defaming her as set forth in detail above.

56. Defendant succeeded in destroying Plaintiff's business relationship with ACA. After Defendant began his internet campaign to destroy Plaintiff's reputation, ACA contacted Plaintiff in or about August 2017 and informed her that the Defendant's allegations regarding Plaintiff were not consistent with the image it needed to portray to its client base and business counterparts, and that as a result of the negative publicity, ACA would terminate their relationship with the Plaintiff.

57. Thus, Defendant's malicious defamation of the Plaintiff not only terrorized her, destroyed her reputation and destroyed her relationship with her husband and family, but has also directly and proximately interfered with her contract and prospective business relationship with ACA.

58. Indeed, as a result of the termination of her contract with ACA, Plaintiff lost millions of dollars in damages from the loss of this business relationship alone.

### **FIRST CLAIM FOR RELIEF**

(Assault)

59. The above paragraphs are repeated and incorporated by reference as if fully set forth herein.

60. Defendant's physical confrontation of the Plaintiff on April 26, 2019, including his raising of his fists toward the Plaintiff and issuing her a death threat (as set forth above in detail), was intended to place Plaintiff in apprehension of serious harmful or offensive contact and in great fear of imminent serious bodily injury and death.

61. As a direct and proximate result of Defendant's conduct, Plaintiff was placed in reasonable apprehension of serious harmful or offensive contact and in great fear of imminent serious bodily injury and death, and has suffered severe emotional distress.

62. As a result of the Defendant's assault, Plaintiff has suffered, and will continue to suffer, damages to be proven at trial.

63. In addition to monetary damages, Plaintiff is also entitled to preliminary and permanent injunctive relief, including enjoining the Defendant from coming near the Plaintiff or her place of residence or business, or issuing any further threats to Plaintiff or her family.

64. Plaintiff is entitled to an award of compensatory damages in an amount to be determined at trial. In addition, Defendant's actions were deliberate, willful, intentional, wanton, malicious, and oppressive and in conscious disregard for the rights of Plaintiff, and should be punished with an award of punitive damages in an amount to be determined at trial.

**SECOND CLAIM FOR RELIEF**  
(Defamation)

65. The above paragraphs are repeated and incorporated by reference as if fully set forth herein.

66. The defamatory statements that are set out with particularity in paragraphs 18 to 36 above and that Defendant published on his social media profiles about Plaintiff have no basis in fact, are false and defamatory, and are not the subject of any privilege.

67. Defendant had actual knowledge that the information he published was false, and he acted with malice, including the intent to harass the Plaintiff and destroy her reputation and business. In the alternative, in knowingly publishing highly derogatory information about a private figure (the Plaintiff), Defendant in the least acted in a grossly irresponsible manner and without due consideration for the standards of information gathering.



68. Defendant's published false comments regarding the Plaintiff were made with the intent to harm Plaintiff and with actual malice.

69. Defendant's defamation has directly and proximately caused Plaintiff's special damages, including but not limited to damage to her reputation, her business relationships, her relationship with her husband and child, and severe emotional distress.

70. In addition to monetary damages, Plaintiff is also entitled to preliminary and permanent injunctive relief, including enjoining the Defendant's defamation and interference with business relations. Because Defendant has placed Plaintiff's personal character and reputation publicly at issue, Plaintiff is entitled to a declaratory judgment that Defendant's statements are false.

71. Plaintiff is entitled to an award of compensatory and punitive damages in an amount to be determined at trial.

**THIRD CLAIM FOR RELIEF**  
(Defamation Per Se)

72. The above paragraphs are repeated and incorporated by reference as if fully set forth herein.

73. The defamatory statements that are discussed in paragraphs 18 to 36 and that Defendant published on his social media profiles about Plaintiff are false and defamatory, and not the subject of any privilege.

74. Defendant had actual knowledge that the information he published was false, and he acted with malice, including the intent to harass the Plaintiff and destroy her reputation. In the alternative, in knowingly publishing highly derogatory information about a private figure (the Plaintiff), Defendant in the least acted in a grossly irresponsible manner and without due consideration for the standards of information gathering.

75. Defendant's false statements concerning the Plaintiff include accusations that Plaintiff has committed serious crimes, and are of the type that tend to injure Plaintiff in her trade, business, and profession and impute salacious and immoral conduct to Plaintiff. Defendant's false statements about Plaintiff made to public include the following: that Plaintiff, who is a married woman, is involved in an extra-marital sexual relationship with another man; that Plaintiff has supposedly been raped by a work colleague; that Plaintiff has destroyed evidence relevant to a legal proceeding; and that Plaintiff has engaged in wrongful interrogation and detention of an alleged witness in a legal proceeding.

76. The published false comments were made with the intent to harm Plaintiff and with actual malice.

77. Defendant's defamation has directly and proximately caused Plaintiff's damage, including but not limited to damage to her reputation, her business relationships, her relationship with her husband and child, and severe emotional distress.

78. The injurious character of Defendant's false statements is a self-evident fact of common knowledge which not be pleaded or proved.

79. As such, Defendant's false statements are actionable without proof of special damages.

80. In addition to monetary damages, Plaintiff is also entitled to preliminary and permanent injunctive relief, including enjoining the Defendant's defamation and interference with business relations.

81. Because Defendant has placed Plaintiff's personal character and reputation publicly at issue Plaintiff is entitled to a declaratory judgment that Defendant's statements are false.

**FOURTH CLAIM FOR RELIEF**  
(Tortious Interference with Contract)

82. The above paragraphs are repeated and incorporated by reference as if fully set forth herein.

83. Plaintiff had a valid contract with ACA for consulting services.

84. Defendant was aware of Plaintiff's contract with ACA.

85. Defendant intentionally interfered with Plaintiff's contract with ACA by intentionally inducing ACA to breach the contract.

86. Defendant acted solely out of malice or wrongful means.

87. As a direct and proximate result of Defendants malicious and wrongful actions, ACA breached its contract with Plaintiff. But for Defendant's wrongful conduct, ACA would not have breached its contract with Plaintiff.

88. As a direct and proximate result of the Defendant's malicious and wrongful actions, Plaintiff has suffered damages. To compensate for these damages, Plaintiff is entitled to an award of compensatory and punitive damages in an amount to be determined at trial.

**FIFTH CLAIM FOR RELIEF**  
(Tortious Interference with Prospective Business Relations)

89. The above paragraphs are repeated and incorporated by reference as if fully set forth herein.

90. Plaintiff had a business relationship with ACA.

91. Defendant knew of Plaintiff's business relationship with ACA and intentionally interfered with it.

92. Defendant acted solely out of malice or wrongful means.

93. Defendant's interference directly and proximately caused injury to Plaintiff's relationship with ACA, as evidenced by ACA terminating its business relationship with Plaintiff.

As a direct and proximate result of Defendant's malicious and wrongful actions, ACA ended its ongoing business dealings with the Plaintiff. But for Defendant's wrongful conduct, ACA would have continued its business relationship with the Plaintiff.

94. As a direct and proximate result of the Defendant's misconduct, Plaintiff is entitled to an award of compensatory and punitive damages in an amount to be determined at trial.

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

- (a) An award of compensatory and punitive damages in an amount to be determined at trial;
- (b) Preliminary and permanent injunctive relief enjoining Defendant and his respective agents, servants, employees, officers, and assigns, and all other persons acting in active concert or participation with him, from further publication of any false, malicious, defamatory or materially misleading comments regarding Plaintiff, or issuing any death threats to Plaintiff;
- (c) Preliminary and permanent injunctive relief enjoining Defendant and his respective agents, servants, employees, officers, and assigns, and all other persons acting in active concert or participation with him, from coming near the Plaintiff or her place of residence or business;
- (d) a declaratory judgment that Defendant's comments regarding Plaintiff are false;
- (e) an award of attorneys' fees, costs, and expenses; and
- (f) such other and further relief as the Court deems just and proper.

Dated: New York, New York  
August 8, 2019

**CATAFAGO FINI LLP**

/s/ Tom M. Fini

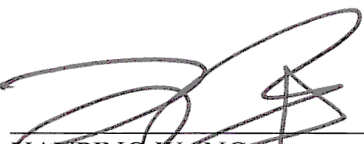
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*Counsel for Plaintiff*

## VERIFICATION

STATE OF NEW YORK     )  
  ) ss:  
COUNTY OF NEW YORK    )

I, Yanping Wang, am the Plaintiff in the above entitled action. I have read the foregoing Complaint and know the contents thereof. The contents are true to my own knowledge except as to matters therein stated to be alleged upon information and belief, and that as to those matters, I believe them to be true.

  
YANPING WANG

Subscribed and Sworn to before me  
on this 8th date of August 2019

  
NOTARY PUBLIC

**KARIN MAISTRELLO**  
NOTARY PUBLIC STATE OF NEW YORK  
Registration No. 01MA6376654  
Qualified in NY County  
Commision expires June, 18 2022

# EXHIBIT A



AFFIDAVIT

STATE OF NEW YORK       )  
                                      ) ss:  
COUNTY OF QUEENS       )

I, Shenyi Glass, am a linguist hired by TransPerfect, a translation services that operates under both ISO 9001:2008 and EN 15038:2006 certification. I have been speaking Mandarin dialect of Chinese for 50 years. I am a recipient of Certifications for New York State Court Interpreter and National Healthcare Interpreter. I have studied Mandarin translation for 5 years.

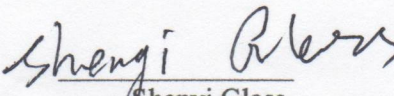
The following document is, to the best of my knowledge and belief a true and accurate translation from Chinese into English:

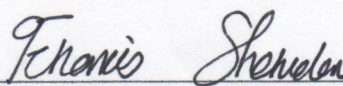
The Attached Social Media Posts

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Sworn to before me this  
Wednesday, August 07, 2019

  
Shenyi Glass,  
Mandarin Interpreter & Translator

  
\_\_\_\_\_  
Signature, Notary Public

FRANCIS SHERIDAN  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01SH6352366  
Qualified In Queens County  
My Commission Expires 12-27-2020

\_\_\_\_\_  
Stamp, Notary Public



西诺 Xi Nuo

<https://twitter.com/sinofreedom/status/889300332320362500>



Guo Wengui directed Wang Yanping to steal the contents of emails from the mailboxes. The quotation from the company "T&M" was from \$US75,000 to \$US100,000 for per mailbox that is hacked.

<https://twitter.com/sinofreedom/status/918671402345037824>



西诺

@sinofreedom

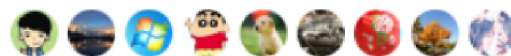
Follow

王雁平：你要想明白了，马蕊一案将要刑诉，你必然要成为被告之一，因为你有协助郭文贵毁灭犯罪证据的嫌疑，在这个关键时刻你必须抢先控告郭文贵性侵，这本来就是事实，你已经被郭文贵骗的很惨，有家不能回，有孩子老公被活活拆散。你被告上法庭就很难翻身了，聪明一点就立刻把郭告了，变被动为主动。

Translate Tweet

7:55 PM - 12 Oct 2017

199 Retweets 66 Likes



Wang Yanping: You have to think clearly. The case of Ma Rui is going to be a criminal case. You definitely will become one of the defendants, because you are suspected of assisting Guo Wengui in destroying the forensic evidence. You should first sue Guo Wengui for sexual assault at this critical moment, after all it is the truth. You have been terribly deceived by Guo Wengui--you cannot go back home and you have been separated from your child and husband out of your choice. Once you are sued in court, it will be very hard to turn things around. Be smart and sue Guo Wengui immediately to turn the table around and take the situation under your control.

<https://twitter.com/sinofreedom/status/901422516547321856>



西诺

@sinofreedom

Follow

Replying to @sunxiaotian12

Robert 是雁平妹的相好，他没有立场，只看钱。

Translate Tweet

5:34 AM - 26 Aug 2017



1



Robert has an intimate relationship with Sister Yanping (Wang Yanping). He doesn't have a decent stance but only cares about the money.

<https://twitter.com/sinofreedom/status/905465344197746689>



西诺

@sinofreedom

Follow

雁平伐马。雁：我很爱马妹妹，她是个很单纯的孩子，马：你助纣为虐，把我监禁在公寓中。雁：她性格内向，可能有忧郁症。马：你把我手机抢走，威逼我不报警。雁：网上传的所谓王雁平与马蕊对话录音全部是假的，马：你以为可以欺骗一些人，也可以欺骗一段时间，但是你不可能永远欺骗所有人。



变态辣椒 @remonwangxt  
影后

Translate Tweet

9:18 AM - 6 Sep 2017

**Yanping's war against Ma (Rui).**

Yan: I love sister Ma very much, she is a very innocent kid.

Ma: You helped bad people to victimize the weak and detained me in the apartment.

Yan: She is introverted and may suffer depression.

Ma: You grabbed my cellphone and forced me not to call the police.

Yan: All the so-called conversation recordings between Wang Yanping and Ma Rui on the internet are fake.

Ma: You may think that you can deceive some people, and you can deceive them for some period of time, but you will never be able to deceive everyone forever.

## **EXHIBIT B**



AFFIDAVIT

STATE OF NEW YORK       )  
                                      ) ss:  
COUNTY OF QUEENS       )

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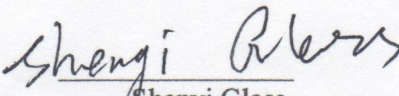
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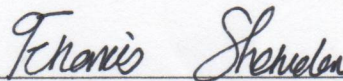
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## **VIDEOS + TWEETS**

### **1. A conversation between Xi Nuo and Xia Yeliang**

西诺：于泳亲自告诉我，说最最可怜的是郭美。

Xi Nuo: Yu Yong told me in person stating the most miserable person is Guo Mei.

夏业良：郭美住院的时候于泳陪着她呢是吧。另外还有他的儿子郭强好像也被他搞的……

Xia Yeliang: While Guo Mei (Miles Kwok's daughter) was admitted in the hospital, she was accompanied By Yu Yong, wasn't she? Also, it seems like his son Mileson Kwok was also messed up by him...

西诺：郭强的，就变成趴灰了呀。郭强的女朋友是一个很漂亮的模特，郭文贵趁着郭强出差的时候对她进行性侵了。

Xi Nuo: Mileson Kwok has become such a pitiable weak man. Mileson Kwok's girlfriend is a very beautiful model. Guo Wengui sexually assaulted her when Mileson Kwok went on a business trip.

夏业良：人家说他乱伦……

Xia Yeliang: People said he committed incest...

西诺：乱伦指的是王雁平。

Xi Nuo: The one who was involved in the incest is Wang Yanping.

夏业良：王雁平是他侄子的老婆。

Xia Yeliang: Wang Yanping is his (Guo Wengui's) nephew's wife.

西诺：侄媳妇。所以就是这么说的。这个人下三滥，兔子也不吃窝边草啊。

Xi Nuo: Nephew's wife. That's why he was called a rotten piece of shit. Even the rabbit won't taste the grass in or around its cage.

夏业良：而且他经常骂郭强，他录音里……

Xia Yeliang: Also, he often scolded Mileson Kwok, in the recordings, he...

西诺：骂他是无能。郭强也是厌恶这个爹。为什么呢？你想想，哪个做爹的能把女儿儿子推到犯罪的第一线。你看看香港的那个案子里面，头一个起诉的不是郭文贵，是他女儿，还有他儿子。

Xi Nuo: Scolded him for incompetence. Mileson Kwok also despised this dad. Why? Just think, what kind of dad could push his own daughter and son to the frontline of the crimes? Check out the cases in Hong Kong--the first person to be sued is never Guo Wengui, but always his daughter and his son.



夏业良：这样把他儿女都害了。虎毒不食子呀。

Xia Yeliang: That's how his children got ruined. Even the fierce tiger won't bite on its own cubs (Chinese idiom: everyone loves their own children).

西诺：我们都是有孩子，都是鼓励他做正当的事情，不做违法的事。然后我觉得你们安徽胡适老家的人都是重视教育。

Xi Nuo: We all have children. We encourage them to do proper things, but not illegal things. And I think people in An Hui—the hometown of Hushi (Province in Eastern China) all value the education very much.

夏业良：郭害了他家里多少人？他的八弟，因为当时警察抓捕，拘捕

Xia Yeliang: How many members in Guo's family have been ruined by him? His eighth brother, when police made the arrest at that time...

西诺：郭文贵当时干了件什么事情，他掐住那个警察的脖子，他弟弟一看，我可能掐住脖子，那我不就拿菜刀砍嘛。

Xi Nuo: What Guo Wengui did at that time is that he grabbed the police officer's neck. When his younger brother saw that his big brother could grab the officer's neck, he brandished a kitchen knife and hacked!

夏业良：结果警察一枪就打死了。

Xia Yeliang: So he was killed by the police with a single shot.

## 2. <https://youtu.be/hPtBIwQPOHA> (2:37-3:35)

### 實勝傳媒 GBSMedia

有关上午庭审的场景。

今天早上一共对三位证人进行咨询。

第一位出席的就是王雁平，王雁平今天穿了一身素装，打扮也蛮精神的。

律师问她的问题，你是代表谁，你为谁工作。

她说从 2009 年开始我就为 Guo Family 服务。她说我的服务对象是他们家庭的 100 多人。

另外她说我工作主要是为这个家庭搜集资料，准备资料，准备文件。其他的我做不了主。她的意思就是这些事情跟我没有关系。

律师又问她，XXX 离岸公司参与这个楼的购买你知不知情，她说我不知道。但是律师又拿着一堆文件说，你签署了这些文件，你难道不知道吗？

她就支支吾吾，她说我 Super nervous，我太紧张了，我已经忘掉了这些事情。请你原谅。这就看出来，她在这些面前是撒了谎。



Xi Nuo:

So I will tell you guys about the situation of the trial this morning. There were three witnesses being examined in the morning and the first one who testified was Wang Yanping. She wore plain clothes today and looked like she was in pretty good spirits. She was asked by the counsel whom she was representing and whom she worked for. She said she started working for the Guo family in 2009, and she worked for around 100 people in the family. Also, she said her main duty is to conduct research, prepare materials and documents for this family. She did not have the final say on other matters. What she meant was that she has nothing to do with these matters. The counsel then asked her if she knew about the purchase of this building by XXX, the off-shore company. She replied she didn't know. Yet, the counsel held a pile of papers and said, "You signed all these papers, but you knew nothing about these?" She then stammered and said she was super nervous, she had already forgotten these matters and please pardon her. So, it was obvious that she had lied on these matters.

3. Tweet: (2017/9/5)

<https://twitter.com/sinofreedom/status/905275978448080898>



西诺

@sinofreedom

关注

今天露面的王雁平声音与以往录音差不多。应该肯定是真实的王雁平。今天王雁平矢口否认推上公布的她与郭文贵啪啪啪的录音，她甚至完全否认她与马蕊的对话录音，她对郭文贵涉嫌强奸闭口不言。她强调自己是有18年党龄的共党，她对郭的爆料持支持立场。采访日期不明，为何不在郭府，明镜没有交代。

下午8:46 - 2017年9月5日

Xi Nuo:

Wang Yanping showed up today and her voice is similar to that of hers in past recordings. It should be confirmed that it is the real Wang Yanping. Wang Yanping denied today that the recording of her having sex with Guo Wengui published on Twitter was true. She even totally denied the recorded conversation between her and Ma Rui was true. She did not comment at all on the alleged rape Guo Wengui involved. She emphasized that she had been a CCP member for 18 years. She had expressed support for Guo's disclosing effort. The date of the interview is unclear, Der Spiegel did not explain why it was not held in Guo's residence.

# EXHIBIT C

AFFIDAVIT

STATE OF NEW YORK       )  
                                      ) ss:  
COUNTY OF QUEENS       )

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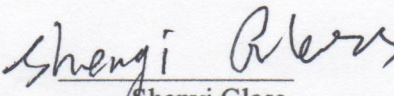
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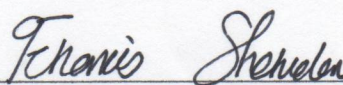
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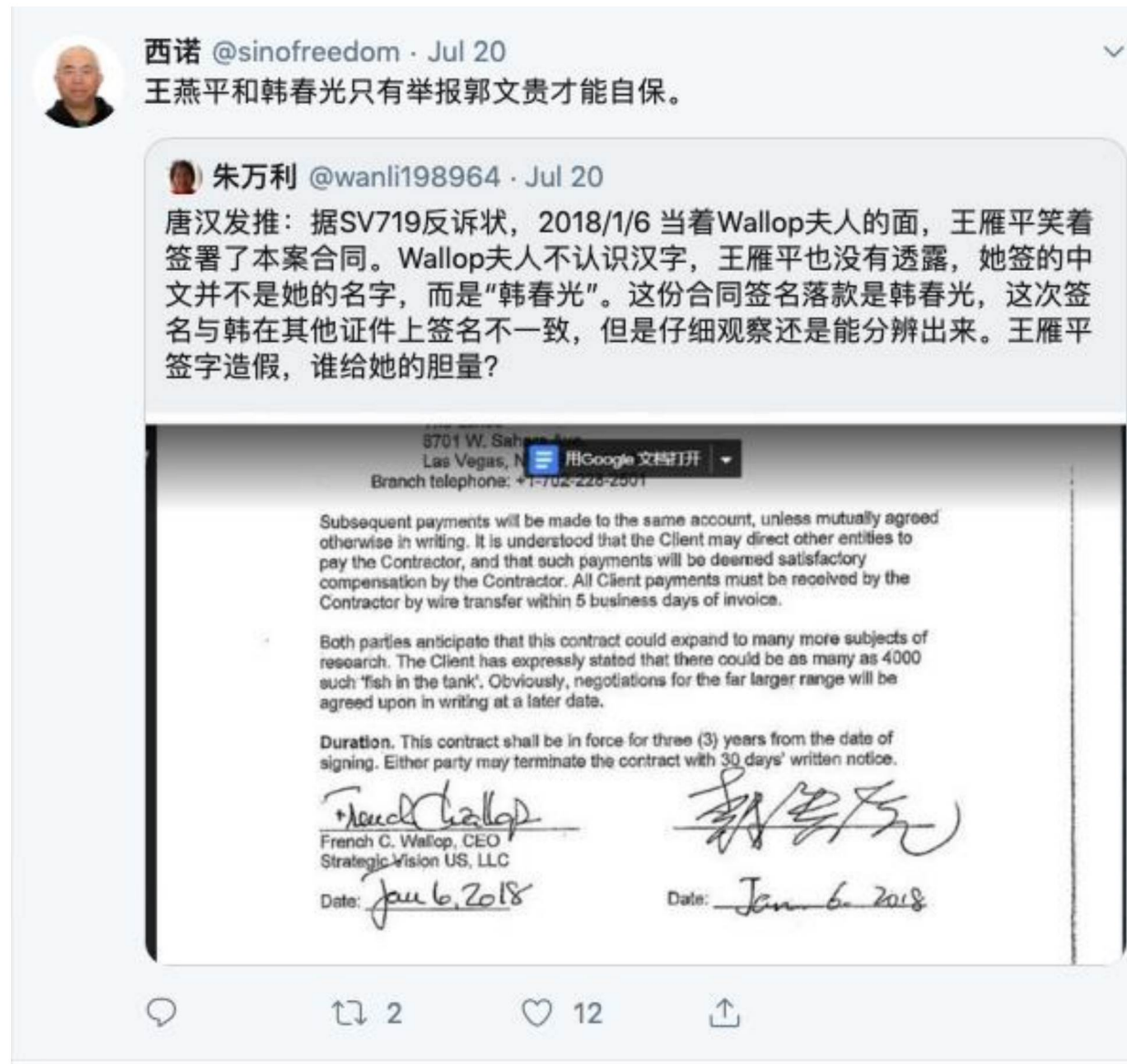
  
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**Xi Nuo's tweets**

<https://twitter.com/sinofreedom/status/1152590907306336256?s=20>

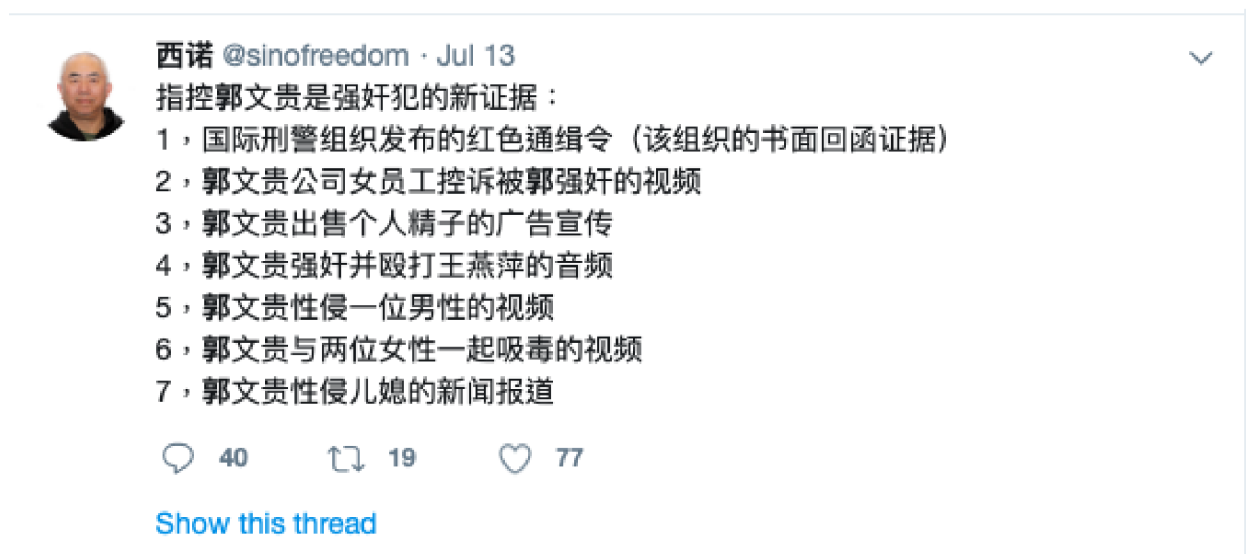
Only when Wang Yanping and Han Chunguang report on Guo Wengui can they save themselves.

Tang Han tweeted: According to SV719 counterclaim, Wang Yanping signed the contract in this case with a smile on her face on 01/06/2018 right in front of Mrs. Wallop. Mrs. Wallop doesn't read Chinese characters. Wang Yanping didn't mention that the Chinese name she signed isn't her name, but Chinese character "Han Chunguang". The signature on this contract is "Han Chunguang", of course this signature is different from what Han has signed on other documents. One can tell the difference if he observes it carefully in details. Wang Yanping fabricated the signature. Who gave her this gut?



<https://twitter.com/sinofreedom/status/1150547791808270338?s=20>

Wang Yanping called herself as “I Wang Yanping” (0:16), Guo Wengui said “Ah, Yanping” in a dearly tone (0:33). The two of them publicly admitted their identities voluntarily.



<https://twitter.com/sinofreedom/status/1150006947397152768>

New evidences that support Guo Wengui as a suspect of rape are:

1. The red wanted fugitive warrant issued by the Interpol (Proof of a written reply from the organization)
2. The video clip of Guo Wengui's female employee claiming that she was raped by Guo Wengui
3. The advertisement about Guo Wengui selling his personal sperms

4. The audio clip of Guo Wengui raping and assaulting Wang Yanping
5. The video clip of Guo Wengui sexually assaulting a man
6. The video clip of Guo Wengui taking drugs with two women
7. The news report about Guo Wengui sexually assaulting his daughter-in-law



西诺 @sinofreedom · Jul 13

4.郭文贵性侵并殴打王燕萍

[youtu.be/dGppXFktxc?IL..](https://youtu.be/dGppXFktxc?IL..)

Published by:华人频道

Published on Sep 9 2017



盘老板郭文贵和女秘书王雁平办公室啪啪啪第八季

盘老板郭文贵和女秘书王雁平办公室啪啪啪第八季

[youtube.com](https://youtube.com)



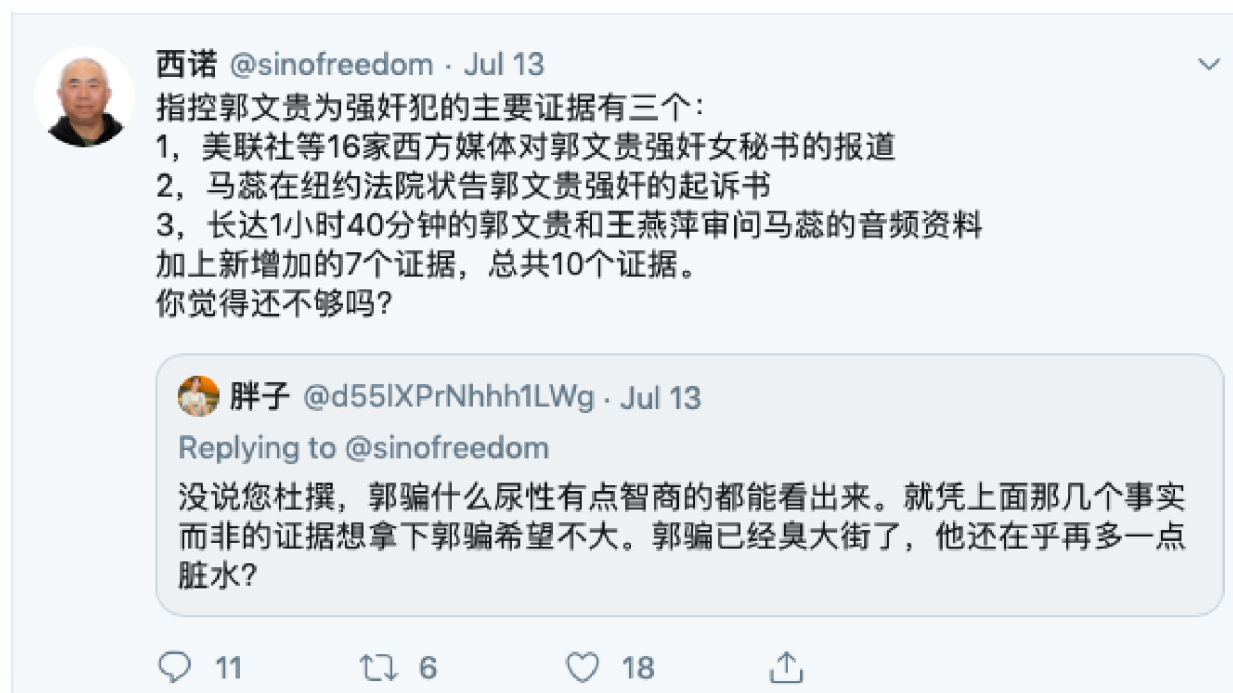
[Show this thread](#)

<https://twitter.com/sinofreedom/status/1150055175958216710>

4. Guo Wengui sexually assaulted and beat Wang Yanping

Published by: Chinese Channel

Pangu Boss Guo Wengui having sex with female secretary Wang Yanping in office (Season 8)



<https://twitter.com/sinofreedom/status/1150143904102174720?s=20>

There are 3 main pieces of evidence that support the charge against Guo Wengui as a rapist:

1. 16 western media companies including Associated Press reporting about Guo Wengui raping a female secretary
2. The legal complaint filed by Ma Rui in the New York Court, accusing Guo Wengui raping her
3. The one-hour-forty-minute audio clip of Guo Wengui and Wang Yanping interrogating Ma Rui

Along with the 7 pieces of newly added evidence, there are a total of 10 pieces of evidence.  
Do you still think it isn't enough?



西诺 @sinofreedom · Jul 11

我在大陆生活期间，很少听到有亿万富翁强奸女性事情。富人通常用钱来换取女性的青睐，强奸既危险又失体面，传出去对富人面子不利。商界也会瞧不起靠强奸女人来充斥后宫的二癞子。但是让我确信郭文贵犯有强奸罪行的就是那份录音，其中的声音就是郭文贵和王雁平。这很难作假。



西诺 @sinofreedom · Jul 11

Replying to @abcyyy5119199 and @gloriousgobid

认知郭文贵有一个过程。在撰写北大方正股权之争时我向北京朋友了解郭，他们说郭是个流氓，他多次强奸公司女员工，我不太相信一个亿万富翁会干这等下流事。后期报道中我从未提及郭强奸女员工一事。后来网上录音出来我有点半信半疑，直到美联社报道郭文贵强奸女秘书马蕊，我才确信郭强奸是确有其事。



5



1



11



<https://twitter.com/sinofreedom/status/1149417419187863552?s=20>

I seldom heard about billionaires raping women when I was living in mainland China. The rich people usually used money to win the hearts of women, as raping not only is dangerous, it also makes one person lose his social status. Once it is discovered, the rich man will lose face. The business world also looks down on those low class guys who rely on raping women to expand the number of women they own. But what convinces me that Guo Wengui committed rape is that audio recording. That is the voice of Guo Wengui and Wang Ping. It is hard to fabricate.



西诺 @sinofreedom · Jul 11

我认为我的辩解足以打动法官和陪审团。因为我的个人认知 (personal knowledge)是建立在如下的基础：

- 1，我与王燕萍和郭文贵有多次面对面接触，熟悉他们的声音。
- 2，我有澳洲和加拿大声纹鉴定机构的检测报告
- 3，我有美联社对郭文贵强奸马蕊的报道。

西诺 @sinofreedom

如果法官问我，你如何认定王燕萍郭文贵审问马蕊的音频是真的？

我的回答：我与郭文贵有三次面对面接触，我与王燕萍有一次面对面的接触。我非常熟悉他俩的声音和语调，同时我有澳洲和加拿大声纹鉴定机构的检测报告。美联社的报道佐证了部分事实。...



10



6



20



<https://twitter.com/sinofreedom/status/1149309155716603904>

I believe my argument is enough to convince the judge and the jury because my personal knowledge is established based on the following:

1. I have had a lot of face-to-face contacts with Wang Yanping and Guo Wengui. I am familiar with their voices.
2. I have the assessment reports from the Australian and Canadian voiceprint identification companies.
3. I have Associated Press's published report on Guo Wengui raping Ma Rui.



西诺  
@sinofreedom

Follow

我把郭文贵王燕萍审问马蕊的录音听了5遍，其中有9次威逼马蕊交出被强奸的证据，譬如沾了体液的内衣，带血的床单，买避孕药的药店名，强奸次数、地点，船姐和保镖是否在场等。下次当法官问我：你如何认为郭是个强奸犯？我的回答：如果郭文贵没干这丧天害理的强奸暴行，为何要千方百计销毁这些证据？

5:21 AM - 11 Jul 2019

8 Retweets 48 Likes



13 8 48

<https://twitter.com/sinofreedom/status/1149292519206899712>

I have listened to the recording of Guo Wengui and Wangyanping's interrogation on Ma Rui 5 times. There are 9 occasions where Ma Rui was coerced to hand over the evidences of being raped, for example, the underwear contaminated by bodily fluid, the blood-stained bed sheet, the name of the pharmacy for getting birth-control pills, the number of times of being raped, the locations of the offenses and whether or not the boat staff and security guards were present etc. If the judge asks me next time why I think Guo is a rapist, I will reply, "If Guo Wengui didn't commit such an outrageous rape, why would he need to use every means to destroy these evidences?"



西诺

@sinofreedom

Follow

如果法官问我，你如何认定王燕萍郭文贵审问马蕊的音频是真的？

我的回答：我与郭文贵有三次面对面接触，我与王燕萍有一次面对面的接触。我非常熟悉他俩的声音和语调，同时我有澳洲和加拿大声纹鉴定机构的检测报告。美联社的报道佐证了部分事实。

因此，我确信王燕萍郭文贵审问马蕊的音频资料是真实的。

美音 @SBguang\_guang

之所以我们和蚂蚁帮不同，甚至是高一等级的生物，在于我们有人正常的逻辑思维。郭文贵最在意的就是自己的形象，被人指控强奸怎么就容忍了呢，没有做过任何澄清的努力，比如反诉，比如去鉴定录音凭证为假等，足以证明极度心生畏惧。有起诉几十个不相干人的劲头，为什么对马蕊案讳莫如深？ [twitter.com/sinofreedom/st...](https://twitter.com/sinofreedom/status/1149302168542941185)

5:59 AM - 11 Jul 2019

1 Retweet 11 Likes



2

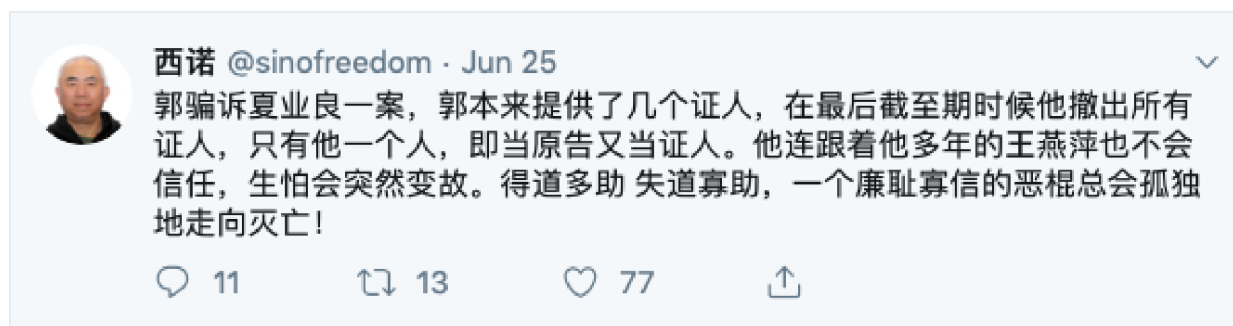
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<https://twitter.com/sinofreedom/status/1149302168542941185>

If the judge asks me, “How can you confirm that the audio clip about Wang Yanping and Guo Wengui interrogating Ma Rui is real?”

My reply will be, “I have had face-to-face contacts with Guo Wengui on three occasions, while I have once with Wang Yanping. I am very familiar with their voices and intonations. Also, I have the analysis reports from Australian and Canadian voiceprint identification companies. The report published by Associated Press has also corroborated with part of the facts. Therefore, I believe that the audio clip about Wang Yanping and Guo Wengui interrogating Ma Rui is real.”



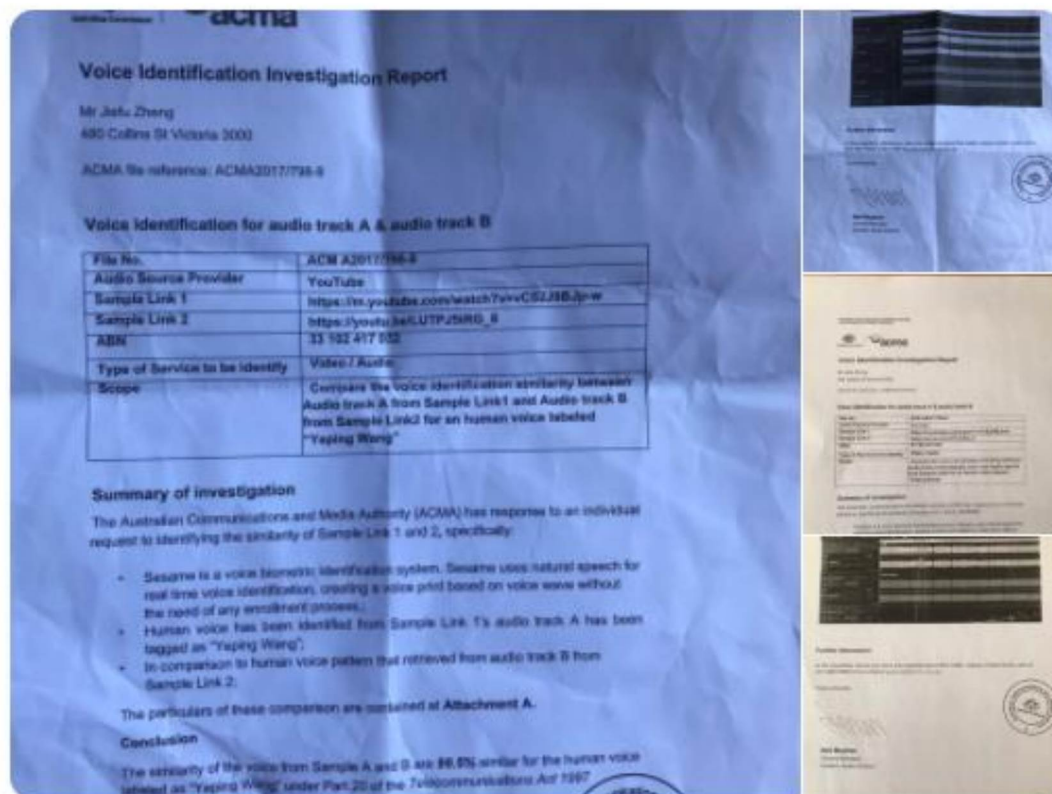
<https://twitter.com/sinofreedom/status/1143470027494109184?s=20>

In the case of Liar Guo suing Xia Yeliang, Guo originally had several witnesses, but he withdrew all the witnesses at the very last minute. Eventually it ended up with him being alone as the plaintiff and the only witness. He didn't even trust Wang Yanping who followed him for so many years, worrying that there might be unexpected things coming up. When a person is in right path, there are more helps available to him; otherwise, none awaits him ahead. A thug who has no shame and trustworthiness will eventually head to the path of demise alone.



西诺 @sinofreedom · Jun 7

郭文贵与秘书王雁平一起审讯马蕊的音频被曝光后，王女士接受明镜采访，留下了她的音频，后经过澳洲司法部门鉴定，王雁平接受采访的音频与审问马蕊留下的音频完全一致。该证据交给法庭。



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<https://twitter.com/sinofreedom/status/1137014570034352129>

Since the exposure of the audio clip about Guo Wengui and his secretary Wang Yanping interrogating Ma Rui together, Ms. Wang accepted the interview from Der Spiegel, leaving recorded proof of her voice. After verification from the Australian judicial authorities, the audio clip of Wang Yanping having an interview with Der Spiegel is the same as the audio clip of her interrogating Ma Rui. This evidence has already been submitted to the court.



西诺 @sinofreedom · May 23

下次见到王燕萍必须问的问题：法庭文件显示你和韩联潮向SV公司提供了96人的调查名单，请问该合同的签字人是不是你？你在东利公司中担任什么职务？你调查这96人的目的是什么？100万的调查经费哪里来的？以什么方法汇入美国？这笔钱与郭文贵的香港洗钱案有什么关系？



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<https://twitter.com/sinofreedom/status/1131517968452599810>

Next time when (I) see Wang Yanping, (I) must ask her the following questions: Court papers show that you and Han Lianchao gave Strategic Vision a list of 96-people to be investigated. Are you the one who signed that contract? What was your position in Eastern Profit? What is the purpose of you investigating these 96 people? Where did the \$1,000,000 investigation fee come from? In what way was the money transferred to the States? How is this amount of money related to the Guo Wengui's money laundering case in Hong Kong?



西诺 @sinofreedom · May 12

有一次郭文贵喝醉酒后对王燕萍施暴，他不仅强奸王，而且用脚在她的肚子上猛烈地踩踏。这段录音网上有记录。当时好像瓦利也在场。

西诺 @sinofreedom

我对王燕萍讲，你跟着郭文贵没有任何出路。郭对朋友从来就没有一丁点的忠诚度，能有价值就利用，无价值就像丢抹布一样抛弃。我希望她能去纽约警局报警，控告郭文贵强奸和殴打她本人。这一招必能反败为胜。

[twitter.com/TangHan3296711...](https://twitter.com/TangHan3296711...)



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<https://twitter.com/sinofreedom/status/1127557203844640768>

There was an occasion where Guo Wengui assaulted Wang Yanping after he got drunk. Not only did he rape Wang, he also stepped on her belly violently. There was a recording of this audio clip online. It seems that Wa Li was there at that time too.





西诺 @sinofreedom · May 12

我对王燕萍讲，你跟着郭文贵没有任何出路。郭对朋友从来就没有一丁点的忠诚度，能有价值就利用，无价值就像丢抹布一样抛弃。我希望她能去纽约警局报警，控告郭文贵强奸和殴打她本人。这一招必能反败为胜。



唐汉 @TangHan32967114

母亲节特别专辑

“当我离开中国时，我的儿子是一岁五个月，现在他差不多六岁，该上学了。”...

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<https://twitter.com/sinofreedom/status/1127557203844640768>

I told Wang Yanping that you have no future if you follow Guo Wengui. Guo never has any loyalty to his friends. He uses people when they have value to him and he throws them away like a piece of cleaning shred if they have lost their value to him. I hope that she can report to the NYPD accusing Guo Wengui raping and assaulting her. This action will turn her situation from losing to winning



西诺 @sinofreedom · May 5

有关郭文贵诉叶宁等三人案子，我在PAX庭审前问过王燕平，我说：据郭宝胜介绍，这份合同是你王燕平起草，交给郭宝胜和赵岩。王燕平回答：她说不知情，一切都是郭文贵安排。看来郭用一个假合同测试拥趸的忠诚度，如果穿帮，就将拥趸告上法庭。据了解，该合同是取证西诺性侵，郭文贵提供数百万调查费用



唐汉 @TangHan32967114 · May 5

叶宁称：所谓的协议与事实皆不存在，郭文贵的滥诉应当受到严厉惩戒。郭文贵起诉叶宁的目的在于报复，因为叶宁出于公益代理了西诺夏业良和郭宝胜的案子，使他们摆脱没有律师费的困境。而且，叶宁还是一位中国顶级权利家族的逃亡人士的主辩律师，郭文贵曾斥巨资协助北京追查这位政治敏感的人士的下落。

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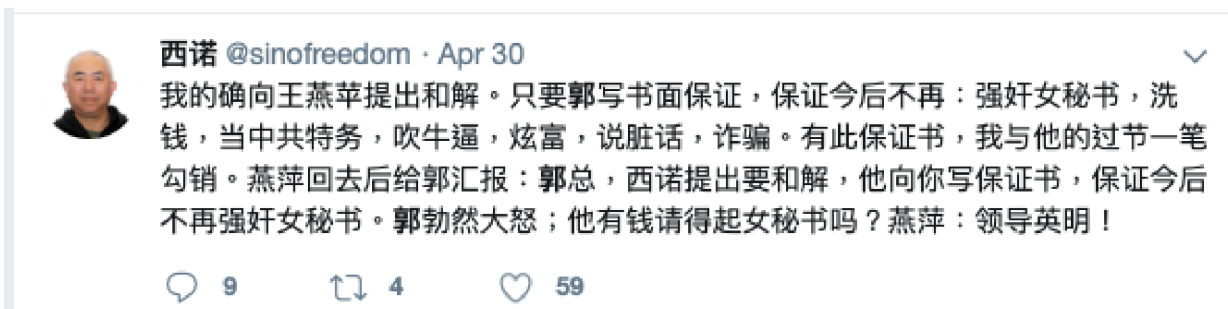
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<https://twitter.com/sinofreedom/status/1125057498476679170?s=20>

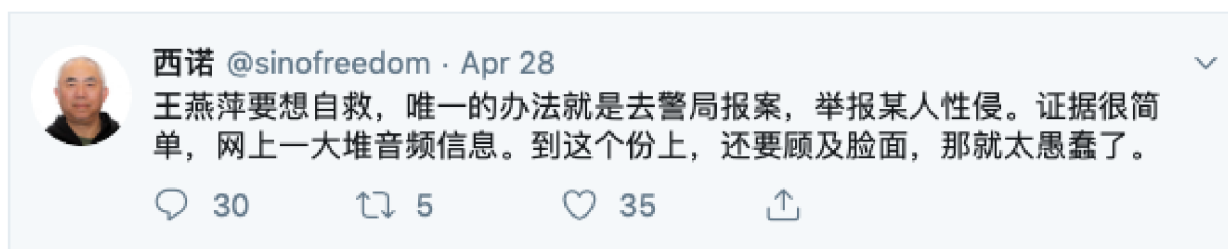
About the case of Guo Wengui suing the three people including Ye Ling, I have asked Wang Yanping before the PAX trial. I said, "According to Guo Baosheng, this contract was drafted by you Wang Yanping, and handed over to Guo Baosheng and Zhao Yan." Wang Yanping replied

that she didn't know and everything had been arranged by Guo Wengui. It looks like Guo Wengui was using a fake contract to test the loyalty of his followers. If the truth was found out, he would sue the followers in court. It has been understood that the contract was designed to get evidence of sexual assault against Xi Nuo, and Guo Wengui has offered several million dollars for the investigation.



<https://twitter.com/sinofreedom/status/1123204023472001024>

I did propose a settlement with Wang Yanping. As long as Guo gave a written statement that he would not rape female secretaries again, not commit money laundering, not to be a spy for CCP, not to boast and show off his wealth, and not to speak foul language and defraud others in the future, all the discord between him and me can be forgotten. Yanping relayed this to Guo when she went back, "Boss Guo, Xi Nuo proposed a settlement, he asked for a guarantee that you are not going to rape female secretaries in the future." Guo got angry immediately, "Does he have money to hire female secretaries?" Yanping replied, "Smart Boss!"



<https://twitter.com/sinofreedom/status/1122386442473410560?s=20>

If Wang Yanping wants to save her own ass, the only way is to file a report in the police station, accusing someone for sexual assault. The evidence is very easy and simple, there are a lot of audio clips online. If she still cares about losing her face in public at this point, she is too stupid.



西诺 @sinofreedom · Apr 28

我在与王燕萍交谈中谈到一个逻辑问题：A非C，B非C，请问A等于B？燕萍一脸茫然。我继续解释，老共反郭，西诺反郭，请问老共等于西诺吗？燕萍不吱声。我再解释，我讨厌吃花椰菜，布什总统也讨厌吃花椰菜，西诺等于布什。燕萍笑了。

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<https://twitter.com/sinofreedom/status/1122494284777820162?s=20>

I raised a logic question when I was having a conversation with Wang Yangpng, “A is not C, B is not C, then is A the same as B?” Yanping looked confused. I continued explaining, “Old CCP is against Guo, Xi Nuo is against Guo, then is Old CCP the same as Xi Nuo?” Yanping stayed silent. I continued explaining, “I hate eating cauliflowers, President Bush also hated eating cauliflowers, Xi Nuo is the same as President Bush.” Yanping laughed.



西诺 @sinofreedom · Apr 27

昨天我最后与王燕萍分手的时候说：燕萍啊，不要再折腾了，回家去和丈夫孩子团聚，老郭靠不住的。燕萍没搭话，看得出来，她是有苦无处说。也是个苦命的孩子。一时糊涂啊！

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<https://twitter.com/sinofreedom/status/1122345021829713920>

When I said goodbye to Wang Yanping yesterday, I said, “Yanping, stop giving yourself a hard time, go back home and be reunited with your husband and children, old Guo is unreliable.” Yanping didn’t respond, but I could tell she had her concerns and dilemma with no one to confide with. She is also a unfortunate kid. Lost her sense at one point!



西诺 @sinofreedom · Apr 26

今天居然偶遇王燕平，她主动与我打招呼，我们也是老熟人了。我与她交谈了大约10几分钟，谈到了她的工作，家庭，以及已经开始的诉讼，我们彼此熟悉的人士。王女士看上去愁容满面，而且头发也没有很好梳理。她脸色有些浮肿，我知道她已经几年没有见到丈夫和孩子。今天她做完证后，与郭打了个招呼就走了。

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<https://twitter.com/sinofreedom/status/1121897117604360192>

To my surprise, I bumped into Wang Yanping today. She took the initiative to say hi to me. We were old acquaintances. I chatted with her for around 10 minutes. We talked about her work, her



family and the ongoing lawsuits. We also talked about the people whom we are both familiar with. Ms. Wang had sadness all over her face. She didn't comb her hair properly, and her face looked a bit swollen. I know she hasn't been seeing her husband and children for several years. After she gave her testimony today, (she) simply said hi to Guo and then left.



西诺 @sinofreedom · Apr 1

根据王艳平留下的音频证据，我们在澳洲和加拿大同时做了两份独立的声纹分析。分析结果显示，王艳平接受明镜采访的音频与王艳平审问马蕊的录音音频高度相似。



西诺 @sinofreedom · Apr 1

记得我听到王艳平审问马蕊的录音后，我就与陈小平私信，我说王艳平是从此不再出境了。陈说他会争取采访王。我公开打赌200美元，断言王不会出境。陈笑我会输的很惨。最终小平赢了，艳平留下了我期待的声纹。张竹先生说赢了，还请我吃顿饭。愿赌服输，我200美刀支票放在身边，小平你随时可以来取！



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<https://twitter.com/sinofreedom/status/1112769113276010496?s=20>

Based on the audio evidence that Wang Yanping left, we conducted two separate and independent voiceprint analyses in Australia and Canada at the same time. The analysis results show that, the audio file of Wang Yanping having an interview with Der Spiegel is highly similar to the voice recording of Wang Yanping interrogating Ma Rui.



西诺 @sinofreedom · Feb 21

2018年1月你指挥王燕平与T&M 公司签约，继续跟踪令完成。请问这笔合同的费用是否也是来自你的借款？谁能借款给你搞特务行动？



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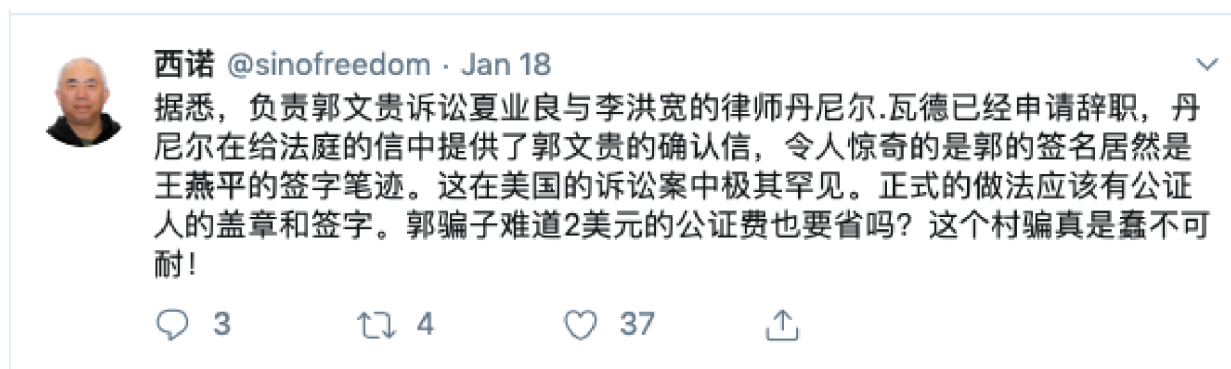
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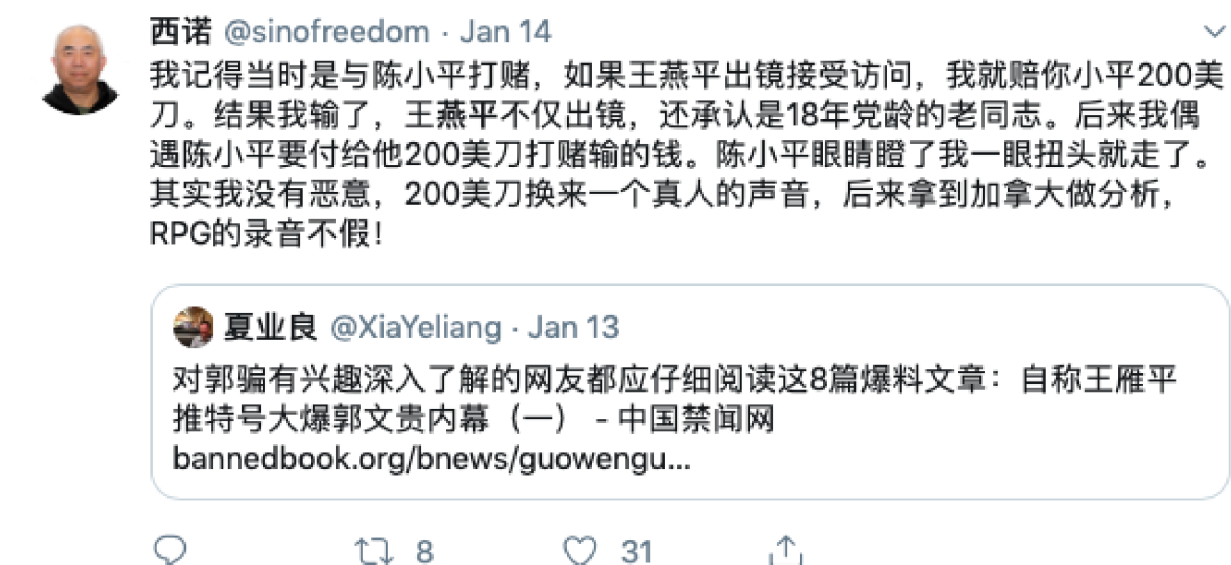
<https://twitter.com/sinofreedom/status/1098650135649796097?s=20>

You directed Wang Yanping to sign the contract with T&M company in Jan 2018 and continue to follow Ling Wancheng. Was the cost for this contract from your loan as well? Who will lend money to you for your spy operation?



<https://twitter.com/sinofreedom/status/1086445157724160000?s=20>

It has been learned that the counsel Daniel Watt who is retained by Guo Wengui for a lawsuit against Xia Yeliang and Li Hongkuan has already applied for withdrawal. What is surprising is that in Guo Wengui's confirmation letter that Daniel submitted to the court is actually signed in Yanping's handwriting. This is very rare in a US lawsuit. The proper way of doing this should be having a notary's stamp and signature. Does Liar Guo even want to save 2 dollars in notary fee? This liar is really stupid!



<https://twitter.com/sinofreedom/status/1084830790888968193?s=20>

I remember I made a bet with Chen Xiaoping at that time, saying if Wang Yanping appeared on camera for an interview again, I would give him USD 200. In the end, I lost the bet. Not only did Wang Yanping appear on camera, she also admitted she had been a CCP member for 18 years. I then offered to give Chen Xiaoping the USD 200 that I lost in the bet when I encountered him later on. Chen Xiaoping just stared at me and then left. However, I had no bad intents (I) spent USD 200 in exchange for an authentic voice. I then sent the voice to Canada for an analysis. The recording released by RPG (a twitter account) isn't fake!



西诺 @sinofreedom · Dec 13, 2018

昨天郭文贵发现皮鞋前掌磨破了，他问王艳萍：我好好的5万美刀一双皮鞋没穿几天就破了，啥原因？艳萍：郭总，你这几天踮脚太频繁了。郭：我这踮脚也不是一时半会儿，以前鞋没破，咋的现在会破了？艳萍：郭总，好好的—双鞋你非的刷上三色油漆，这牛皮（逼）不就穿帮了？郭：莘县阳谷县搭县，有道理。

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<https://twitter.com/sinofreedom/status/1073394544962617344?s=20>

Guo Wengui found that the front part of his shoe was worn yesterday. He asked Wang Yanping, "This pair of leather shoes cost me USD 50,000, I have worn them for just a few days and they were torn! What's happened?" Yanping replied, "Boss Guo, you tiptoed too much these days." Guo said, "I have been tip-toeing for quite some time, my shoes weren't torn back then. Why would they be torn now?" Yanping said, "Boss Guo, you insisted on putting three layers of paint on a good pair of shoes, isn't that how the cow leather get torn?" Guo then said, "Whatever you say, it makes sense."



西诺 @sinofreedom · Nov 2, 2018

黄河边播报发出公告，今天美西时间8点将公布一件事情，说是郭身边最后—名女幸心腹背叛其主，不辞而别。不晓得这位女士是不是王燕平？她可是阿贵最为放心的大内管，如果燕平出走，郭的大厦顷刻塌了半边。看看跟随郭骗的屈国娇，于泳，杨鑫鑫，马蕊，王燕平，哪一个不是被郭畜生凌辱到遍体鳞伤？

18

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68



<https://twitter.com/sinofreedom/status/1058513693280030721?s=20>

Huang Hebian issued a public notice that there would be an announcement at PST 8 o'clock regarding the last and trusted female subordinate of Guo betrayed him and left him without a notice. Wondering if this lady is Wang Yanping. She is the steward that Guo trusted the most. If Yanping left, Guo's world will collapse in half. Take a look at the people who followed Liar Guo-- Qu Guojiao, Yu Yong, Yang Xinxin, Ma Rui and Wang Yanping. Are there any of them who are not tortured and abused with the wound all over their bodies by Animal Guo?